Albert A. Ciardi, III, Esquire Thomas D. Bielli, Esquire Holly E. Smith, Esquire CIARDI CIARDI & ASTIN One Commerce Square, Suite 1930 2005 Market Street Philadelphia, PA 19103 (215) 557-3550 Attorneys for the Debtor

UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

: CHAPTER 11

WJO, INC.,

: **BANKRUPTCY NO. 10-19894**

DEBTOR.

APPLICATION FOR ORDER PURSUANT TO 11 U.S.C. § 327 AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 2014 OF WJO, INC. TO EMPLOY POND LEHOCKY STERN GIORDANO AS SPECIAL COUNSEL

WJO, Inc. (the "Debtor"), hereby files this application for order pursuant to 11 U.S.C. § 327 and Federal Rule of Bankruptcy Procedure 2014 to employ Pond Lehocky Stern Giordano as special counsel to the Debtor, and respectfully represents as follows:

Background

- 1. On November 15, 2010, the Debtor filed a voluntary petition under chapter 11 of title 11 of the United States Code, as amended (the "Bankruptcy Code"). Pursuant to sections 1107 (a) and 1108 of the Bankruptcy Code, the Debtor remains in possession of its property and control of his business as debtor-in-possession.
- 2. The Debtor requests authority to retain Pond Lehocky Stern Giordano as special counsel to represent Debtor's interests in pending worker's compensation matters.
- 3. The Debtor is not sufficiently familiar with the rights and duties involved in defending these actions without the aid of competent counsel.

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4. The Debtor has made careful and diligent inquiry into the qualifications and

competence of the law firm of Pond Lehocky Stern Giordano and is advised that Pond Lehocky

Stern Giordano, by reason of ability, integrity and professional experience, is capable of

providing proper legal counsel to the Debtor with regard to defending against these actions.

5. The Debtor has engaged the services of Pond Lehocky Stern Giordano as special

counsel for the Debtor, subject to the approval of the Court.

6. Prior to the filing of the bankruptcy case, Pond Lehocky Stern Giordano

represented the Debtor in legal matters, and as of the Petition Date, there were no outstanding

fees owed by the Debtor for these services.

7. Pond Lehocky Stern Giordano has no connection with the Debtor and is not an

insider or affiliate of the Debtor. The verified statement of Samuel H. Pond, Esquire is attached

hereto as Exhibit "A."

8. The fees for the services provided by Pond Lehocky Stern Giordano are set forth

in the Affidavit of Samuel H. Pond, Esquire.

WHEREFORE, the Debtor requests the appointment of Pond Lehocky Stern Giordano

as counsel for the Debtor, at such compensation as the Court allows.

Respectfully submitted,

CIARDI CIARDI & ASTIN

By: /s/ Holly E. Smith

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Dated: December 28, 2010